

### **REMARKS**

By this amendment, claims 1, 4, 5, and 8 have been amended. Accordingly, claims 1-2, 4-6, 8, 11 and 13 are currently pending in the application, of which claims 1 and 5 are independent claims.

Applicants respectfully submit that the above amendments do not add new matter to the application and are fully supported by the specification. Support for the amendments may be found at least at page 3, lines 4-6 and at page 8, lines 12-16 of the specification.

Entry of the above amendments and following remarks is respectfully requested to place the present application in condition for allowance. In view of the above amendments and following remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

#### ***Rejections Under 35 U.S.C. § 103***

Claims 1, 2, 4-6, 8, 11, and 13 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U. S. Patent No. 6,391,137 issued to Matsushima ("Matsushima"), in view of U. S. Patent No. 6,908,638 issued to Ueda, *et al.* ("Ueda").

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the reference or references, when combined, must disclose or suggest all of the claim limitations. The motivation to modify the prior art and the reasonable expectation of success must both be found in the prior art and not based upon a patent applicant's disclosure. See *in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The cited references fail to establish a prima facie case of obviousness over claims 1, 2, 4-6, 8, 11 and 13. Assuming *arguendo* that the references may be combined and a reasonable

expectation of success exists, the combined references do not disclose or suggest all of the claim limitations.

Applicants assert that the cited references, either alone or in combination, fail to disclose all features of claims 1 and 5 as amended. Claim 1 and claim 5 as amended each recite, *inter alia*, “etching the upper substrate to a thickness of about 100 micrometers or less, and etching the lower substrate to a thickness of about 100 micrometers or less.” The cited references fail to disclose at least these features. The examiner looks to Matsushima for disclosing a thickness of the glass substrates after etching. Specifically, Matsushima discloses that “the respective glass substrates 100a, 101a composing each liquid crystal display device are thinned so as to have a thickness of about 0.3mm to 0.7mm.” See Matsushima, col. 8 line 67 to col. 9, line 3. However, Matsushima fails to disclose “etching the upper substrate to a thickness of about 100 micrometers or less, and etching the lower substrate to a thickness of about 100 micrometers or less” (emphasis added). Thus, Matsushima fails to disclose every feature of claims 1 and 5.

Further, Ueda is not directed to a method of etching a substrate, and fails to remedy the shortcomings of Matsushima with respect to claims 1 and 5.

Accordingly, for at least these reasons, the cited references, either alone or in combination, fail to disclose or suggest every limitation of claims 1 and 5.

Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1 and 5, and all the claims that depend therefrom, are allowable. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1, 2, 4-6, 8, 11, and 13.

**CONCLUSION**

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

/hae-chan park/

Hae-Chan Park  
Reg. No. 50,114

Date: January 19, 2007

**CUSTOMER NUMBER: 58027**

H.C. Park & Associates, PLC  
8500 Leesburg Pike  
Suite 7500  
Vienna, VA 22182  
Tel: 703-288-5105  
Fax: 703-288-5139  
HCP/WMH/kbs